



Feb. 20, 2020

NRDC Comments on ENERGY STAR Program Requirements for Air Source Heat Pump and Central Air Conditioner Equipment Version 6.0, Draft 2

On behalf of the Natural Resources Defense Council (NRDC) and our 3 million members and online activists, we offer the following comments on ENERGY STAR's version 6.0, draft 2, specification for air source heat pumps and central air conditioners.

We wish to comment specifically on the addition of a controls verification procedure (CVP) to the specification.

As air conditioners and heat pumps become more sophisticated, the software used to control them necessarily becomes more complex as well. In the long term, tests to measure the efficiency of these products must transition to load-based, dynamic tests that more accurately simulate real-world operation.

While the research necessary to create those tests is conducted, however, efficiency testing must not ignore the impact of controls entirely. A CVP is an appropriate way to do so—it ensures that when units are tested, they do not operate in ways that they could never operate in the field. This ensures useful, accurate test results, and differentiates manufacturers that take the time to genuinely improve the efficiency of their products from those that are simply skilled at manipulating the test.

The importance of CVPs will only increase, and we commend EPA and DOE for including one in this specification.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Vukovich", is positioned above the typed name.

Joseph Vukovich
Energy Efficiency Advocate
Natural Resources Defense Council